

EXHIBIT 50

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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION
13

14
15 **STEVEN RUPP; STEVEN**
DEMBER; CHERYL JOHNSON;
16 **MICHAEL JONES;**
CHRISTOPHER SEIFERT;
17 **ALFONSO VALENCIA; TROY**
WILLIS; and CALIFORNIA RIFLE
18 **& PISTOL ASSOCIATION,**
INCORPORATED,

19 Plaintiffs,
20

21 v.

22 **ROB BONTA, in his official capacity**
as Attorney General of the State of
23 **California; and DOES 1-10,**

24 Defendants.
25

8:17-cv-00746-JLS-JDE

**SUPPLEMENTAL EXPERT
REPORT AND DECLARATION
OF RYAN BUSSE**

Courtroom: 8A
Judge: The Honorable Josephine
L. Staton

Action Filed: April 24, 2017

26
27 ¹ Rob Bonta has succeeded former Attorney General Xavier Becerra as the
Attorney General of the State of California. Pursuant to Federal Rule of Civil
28 Procedure 25(d), Attorney General Bonta, in his official capacity, is substituted as
the defendant in this case.

**SUPPLEMENTAL EXPERT REPORT AND DECLARATION OF RYAN
BUSSE**

I, Ryan Busse, declare under penalty of perjury that the following is true and correct:

1. I have been asked by the Office of the Attorney General of the California Department of Justice to prepare an expert report and declaration on the purpose and use of certain firearm accessories or configurations. This supplemental expert report and declaration (“Report”) is based on my own personal knowledge and experience, and, if I am called as a witness, I could and would testify competently to the truth of the matters discussed in this Report.

PROFESSIONAL QUALIFICATIONS

2. I was raised with firearms as an integral part of my life. I began shooting with various guns as a young boy and continued to regularly use and study guns throughout my life (I am now 52). After graduating college, I entered the firearms industry in 1992. I became a sales executive in the firearms industry in 1995, and I spent more than 25 years in this role. While in the industry, I developed innovative sales teams, maintained relationships with the largest national retailers, and was responsible for worldwide sales of millions of firearms. I built a dealer-direct sales network that included more than 2500 firearms dealers including locations in all 50 states, and I regularly visited these dealers. In my job, I also studied and built sales programs that relied on understanding the technical nature of most firearms available in the U.S. market, including AR-platform and other types of rifles. During my career I played an integral role in building one of the largest firearms companies in the United States, Kimber, and I was nominated by shooting industry leadership many times for the SHOT Business “Shooting Industry Person of the Year” Award.² I served in an executive sales capacity as Vice President of

² SHOT Business is a trade publication of the shooting and firearms industry,

1 Sales until August 2020. While in the industry I served as an advisor to the United
2 States Senate Sportsmen’s Caucus, and as the board chairman for Backcountry
3 Hunters & Anglers, a national wildlife conservation and hunting organization.

4 3. I left the firearms industry because I was concerned about what I
5 believed to be irresponsible and dangerous marketing and sales practices. Since I
6 left, I have served as an advisor to the 2020 Biden presidential campaign, I have
7 testified twice before the U.S. Congress about the firearms industry and gun policy
8 (before the House Committee on Oversight and Reform³ and the Joint Economic
9 Committee⁴, respectively), I have been called to testify in closed-door briefings at
10 the U.S. Senate, and I currently serve as a Senior Advisor to Giffords. I remain a
11 proud and active gun owner, outdoorsman, and advocate for responsible gun
12 ownership.

13 4. On behalf of the California Department of Justice, on October 13,
14 2022, I submitted an expert declaration in *Miller v. Bonta*, a lawsuit in the Southern
15 District of California (Case No. 3:19-cv-01537-BEN-JLB) challenging how
16 California regulates assault weapons. On November 10, 2022, I submitted an
17 expert declaration in *Duncan v. Bonta*, a lawsuit in the Southern District of
18 California (Case No. 17-cv-01017-BEN-JLB) challenging how California regulates
19 large-capacity magazines.

20 5. On behalf of the Oregon department of Justice, on November 30,
21 2022, I submitted an expert declaration in *Oregon Firearms Federation Inc. v. State*
22 *of Oregon* (Case No. **Error! Reference source not found.**), a lawsuit challenging
23 Oregon’s large-capacity magazine law. On behalf of the Washington Department of
24 Justice, on October 17 2022, I submitted an expert declaration in *Brumback v.*
25 _____
26 and “Person of the Year” was the highest award given to an individual in the
27 firearms industry.

27 ³ See <https://bit.ly/3CVDQc4>.

28 ⁴ See <https://bit.ly/3My2gLJ>.

1 *Ferguson* (Case No. 1:22-cv-03093-MKD), a lawsuit challenging Washington’s
2 large-capacity magazine law.

3 **OPINIONS**

4 6. I have reviewed the statutory definitions of an “assault weapon,” as
5 defined under California’s Assault Weapons Control Act (AWCA) in California
6 Penal Code section 30515(a).⁵ According to those definitions, certain firearms may
7 qualify as an “assault weapon” if they have certain accessories attached to them or
8 if they are configured in certain ways.

9 7. Under Penal Code section 30515(a), a semiautomatic centerfire rifle
10 that does not have a fixed magazine qualifies as an assault weapon if it has any of
11 the following features: (1) a pistol grip that protrudes conspicuously beneath the
12 action of the weapon; (2) a thumbhole stock; (3) a folding or telescoping stock; (4)
13 a grenade or flare launcher; (5) a flash suppressor; or (6) a forward pistol grip.⁶ A
14 semiautomatic centerfire rifle also qualifies as an assault weapon if it is equipped
15 with a fixed magazine with the capacity to hold more than 10 rounds or has an
16 overall length of less than 30 inches.⁷

17 8. Under Penal Code section 30515(a), a semiautomatic pistol that does
18 not have a fixed magazine qualifies as an assault weapon if it has (1) a threaded
19 barrel (capable of accepting a flash suppressor, forward handgrip, or silencer; (2) a
20 second handgrip; (3) a barrel shroud that insulates the non-shooting hand from heat
21 during firing; or (4) the ability to accept a detachable magazine at any location
22 other than the pistol grip.⁸ A semiautomatic pistol can also qualify as an assault
23

24 _____
25 ⁵ See Cal. Penal Code § 30515, <https://bit.ly/3CtxfEj>.

26 ⁶ Cal. Penal Code § 30515(a)(1)(A)-(F).

27 ⁷ Cal. Penal Code § 30515(a)(2)-(3).

28 ⁸ Cal Penal Code § 30515(a)(4).

1 weapon if it has a fixed magazine capable of holding more than 10 rounds.⁹

2 9. Finally, a shotgun qualifies as an assault weapon if it is semiautomatic
3 and has both a folding or telescoping stock and a pistol grip beneath the action, a
4 thumbhole stock, or a vertical handgrip.¹⁰ A shotgun can also qualify as an assault
5 weapon if it (1) is semiautomatic and lacks a fixed magazine, or (2) has a revolving
6 cylinder that mechanically rotates after each shot.¹¹

7 10. The AWCA also qualifies any semiautomatic centerfire firearm that is
8 not a rifle, pistol, or shotgun and does not have a fixed magazine if it has any one of
9 the following: a pistol grip beneath the action; a thumbhole stock; a folding or
10 telescoping stock; a grenade or flare launcher; a flash suppressor; a forward pistol
11 grip; a threaded barrel (capable of accepting a flash suppressor, forward handgrip,
12 or silencer); a second handgrip; a barrel shroud; the capacity to accept a detachable
13 magazine at a location outside the pistol grip.¹² A semiautomatic centerfire firearm
14 that is not a rifle, pistol, or shotgun can also qualify as an assault weapon if it has a
15 fixed magazine capable of holding more than 10 rounds or is less than 30 inches in
16 length.¹³

17 11. Semiautomatic rifles, including AR-platform rifles, as well as
18 semiautomatic pistols and shotguns, are capable of firing one shot per each pull of
19 the trigger. Centerfire firearms are chambered with centerfire ammunition, which
20 has the primer located in the center of the base of the cartridge case (as opposed to
21 the rim of the cartridge). Today's modern rimfire ammunition is almost always
22 confined to small and less powerful cartridges, such as the .22LR. Bullets fired
23

24 ⁹ Cal. Penal Code § 30515(a)(5).

25 ¹⁰ Cal. Penal Code § 30515(a)(6).

26 ¹¹ Cal. Penal Code § 30515(a)(7)-(8).

27 ¹² Cal. Penal Code § 30515(a)(9).

28 ¹³ Cal. Penal Code § 30515(a)(10)-(11).

1 from these cartridges are small and light and move slower than almost all centerfire
2 rifle ammunition. Rimfire chamberings are common in youth and “beginner”
3 hunting rifles because they are relatively quiet, inexpensive and low recoil.
4 Conversely, modern centerfire ammunition requires a detonation of a primer in the
5 center of the cartridge (CENTERfire) and these cartridges are generally much more
6 powerful than rimfire cartridges. As example, the .223 which is the most common
7 AR-15 cartridge, fires bullets at more than 3000FPS (feet per second) vs a rimfire
8 cartridge that propels bullets at around 1100FPS. This increased centerfire velocity
9 greatly increases the range and lethality of centerfire cartridges. Most handgun
10 cartridges are also now centerfire and these cartridges generally fire bullets much
11 larger than rimfire cartridges usually at velocities of between 800 and 1500FPS.
12 Generally, centerfire weapons fire higher caliber ammunition and/or fire it at higher
13 velocities. The AR-platform, in particular, is the civilian version of the military’s
14 select-fire M-16 and M-4 rifles, which are capable of fully automatic or burst firing.
15 Based on my familiarity with the firearms industry, AR-platform rifles and similar
16 semiautomatic rifles did not begin to sell in significant numbers until the late 2000s
17 and particularly after the 2012 shooting at Sandy Hook Elementary in Newtown,
18 CT.

19 12. The AR-platform is highly modular, enabling owners to customize
20 their rifles with a variety of interchangeable components. Some components of a
21 firearm are integral to its operation, such as a trigger mechanism or barrel, and the
22 firearm will not function properly without them. But as I discuss here, the
23 particular components identified in the AWCA, which qualify a weapon as an
24 “assault weapon” if it is equipped with them, are not integral to the basic operation
25 of any firearm and are not necessary to use a firearm effectively for self-defense or
26 sporting purposes, such as hunting.

27 13. **Pistol grip that protrudes conspicuously beneath the action of the**
28 **weapon.** Pistol grips beneath the action of a rifle or shotgun are not necessary to

1 operate those weapons as designed. A pistol grip is a feature incorporated into
2 some firearm stocks that allows the shooter to control and aim the rifle during
3 periods of rapid fire, such as situations encountered during military firefights.
4 Alternative stock designs that do not incorporate this feature are currently sold in
5 California, and prominent, widely referenced firearms authorities, such as
6 www.caligunner.com, assess those options and the function of these compliant
7 (non-pistol grip) rifles in this manner: “Everyone has a preference on what looks
8 the ‘best’ but the top picks below are *all great functioning options*.”¹⁴ As also
9 noted on that website, while “[s]ome people that are critical of the featureless
10 option complain of the aesthetics of the available options,” “the overall function of
11 the rifle is mostly maintained,” and “several companies continue to innovate and
12 provide new products that look decent and perform well considering the constraints
13 of the law.”¹⁵ While a pistol grip beneath the action of a rifle may be useful during
14 military operations because it helps the shooter stabilize the weapon and reduce
15 muzzle rise during rapid fire, a pistol grip is not necessary to operate a firearm
16 safely in lawful self-defense situations.

17 14. **Thumbhole stocks.** Thumbhole stocks have a hole in the stock that
18 allows the shooter to insert their thumb and mimic the effects of a pistol grip. A
19 thumbhole stock is not necessary to operate a shoulder weapon as designed. A
20 thumbhole stock functions in almost identical fashion to a pistol grip and assists the
21 shooter in rifle control during periods of rapid fire. Again, the current non-
22 thumbhole and California compliant designs are advertised and sold as functioning
23 options for proper use of AR15s and their variants.

24
25
26 ¹⁴ <https://caligunner.com/california-compliant-featureless-rifle/> (emphasis
27 added) (last visited Dec. 30, 2022). A true and correct copy of this caligunner.com
28 webpage is attached as Exhibit A.

¹⁵ Ex. A.

1 15. **Folding or telescoping stock.** The stock of a rifle or shotgun is the
2 part a firearm that allows it to be held at the shoulder for firing. A folding or
3 telescoping stock can be collapsed to shorten the length of the rifle (or extended to
4 extend its length). A rifle or shotgun does not need an adjustable stock to operate
5 as designed and can be equipped with fixed-length stocks instead. Original rifles
6 on which the current existing and newly manufactured AR-15s are based and that
7 were accepted by hundreds of thousands of military officers as their weapon of
8 choice for decades, did not incorporate a folding stock and no credible firearms
9 authority claims that those firearms did not function properly. Further, there are
10 still non-folding stock options available today and all are sold and advertised as
11 fully functioning options for semiautomatic rifles.

12 16. **Grenade or flare launcher.** A grenade and flare launcher is not
13 necessary to operate a firearm as designed. These features are used on military
14 battlefields in which mass casualties or illuminating a battlefield are desirable but
15 have no relevance to civilian self-defense use.

16 17. **Flash suppressor.** A flash suppressor is a device that is attached to
17 the muzzle of a firearm and reduces or redirects the flash when shooting. A flash
18 suppressor is not necessary to operate a firearm as designed. This feature is affixed
19 to military rifles to redirect the light (muzzle flash) generated from the burning of
20 gases while firing which reduces the prevalence of “night blindness” that can
21 develop during low-light firefights. A flash suppressor also disguises the origin of
22 fire and avoid detection by enemy forces but has marginal benefit in civilian self-
23 defense situations, even in low-light conditions. It is widely accepted that the most
24 effective self-defense guns are handguns and home-defense shotguns. Like the AR-
25 15 (and similar rifles), these guns also produce muzzle flash and yet almost none
26 incorporate or require a “flash suppressor” device in order to operate effectively.

27 18. **Forward pistol grip.** A forward pistol grip on a rifle, pistol, or
28 shotgun enables a shooter to stabilize the weapon with the non-trigger hand during

1 fire, and is not necessary to operate any firearm as designed. As evidence, most
2 AR-15s sold today—including the best-selling rifles such as the Smith and Wesson
3 M&P15, which is generally accepted as the best-selling AR-15 in the United
4 States—do not incorporate a forward pistol grip, and I am not aware of any credible
5 firearms authority that states or teaches that these rifles do not function as designed.

6 **19. Fixed magazine with the capacity to accept more than 10 rounds.**

7 A fixed magazine capable of holding more than 10 rounds of ammunition is not
8 necessary to operate any firearm as designed. As explained below in connection
9 with detachable magazines, all firearms are capable of functioning with magazines
10 capable of holding fewer than 10 rounds, including magazines that were originally
11 capable of holding more than 10 rounds but have been permanently modified to
12 hold 10 rounds or less. A fixed magazine of 10 rounds or more is generally a
13 “work-around” to avoid the regulations on detachable magazines, but the same
14 functional realities apply to both detachable and fixed magazines.

15 **20. Detachable magazines.** Detachable magazines enable a shooter to
16 replace an empty or depleted magazine with a fresh magazine to resume firing.
17 While semi-automatic rifles like the AR-15 are not generally considered to be good
18 choices for self-defense situations, a rifle that lacks a fixed magazine, even when
19 retrofitted with a “magazine lock” or “bullet button” that requires the use of a tool
20 (or even a spare round) to release a spent magazine, will function as designed and
21 can be reloaded after firing. Detachable magazines may hold more than 10 rounds
22 of ammunition, which California law defines as “large-capacity magazines.”¹⁶
23 Despite the recent popularization of large-capacity magazines, it is important to
24 note that I am not aware of a single existing firearm that requires a large-capacity
25 magazine to function as designed. By this I mean that all firearms that can accept a
26 large-capacity magazine can also accept a magazine that holds 10 or fewer rounds

27
28 ¹⁶ Cal. Penal Code § 16740.

1 and function precisely as intended. This is true even of AR-platform rifles.
2 Although many AR-platform rifles are sold with a 30 round magazine, the
3 manufacturers all offer the optional purchase of 10 round of even lower capacity
4 magazines. There are many pistols (such at the very popular Model 1911—which
5 was the accepted sidearm of the U.S. Military for decades and is still one of the
6 most widely sold guns in the United States) that are built for magazines of eight
7 rounds or less. While larger 10-plus round magazines exist for the 1911 and other
8 similar pistols, a smaller magazine (standard seven or eight round) is considered
9 preferable by almost all consumers because the physical size/profile of the shorter
10 magazine is easier to carry, shoot and conceal. Still today the 1911 and other
11 similar guns which are built to function with sub-10 round magazines are built by
12 many gun companies (Smith and Wesson, Ruger, Kimber, Springfield, Rock Island,
13 Dan Wesson, and many other companies build and sell these 1911 pistols) and they
14 are sold in high volumes by most retailers in the United States. These guns are still
15 considered extremely effective self-defense firearms by many of the leading
16 firearms trainers in the country.

17 21. **Overall length of less than 30 inches.** A firearm does not need to be
18 less than 30 inches in length to operate as designed. There is a long-accepted
19 history of regulating “short barreled rifles” under the National Firearms Act (NFA),
20 which was implemented due to criminal actions resulting from concealing and then
21 deploying “short barreled rifles” in acts of surprise mass murder. Generally, there
22 are only two ways to reduce the length of an AR-15 platform firearm and those are
23 the barrel length (long-regulated by the NFA) and stock (collapsible or folding
24 designs were not yet available in 1934 when the NFA was enacted). In other
25 words, the AWCA’s regulations on collapsible and folding stocks and short barrels
26 are merely addressing the same and historically accepted regulation on rifle length
27 as the NFA.
28

EXHIBIT A



2021 Featureless AR-15 Rifles: All You Need to Know!

In [CA Law \(https://CaliGunner.com/category/ca-law/\)](https://CaliGunner.com/category/ca-law/), [Firearms \(https://CaliGunner.com/category/ca-law/firearms/\)](https://CaliGunner.com/category/ca-law/firearms/),
[Guide \(https://CaliGunner.com/category/guide/\)](https://CaliGunner.com/category/guide/), by Jim /

.().

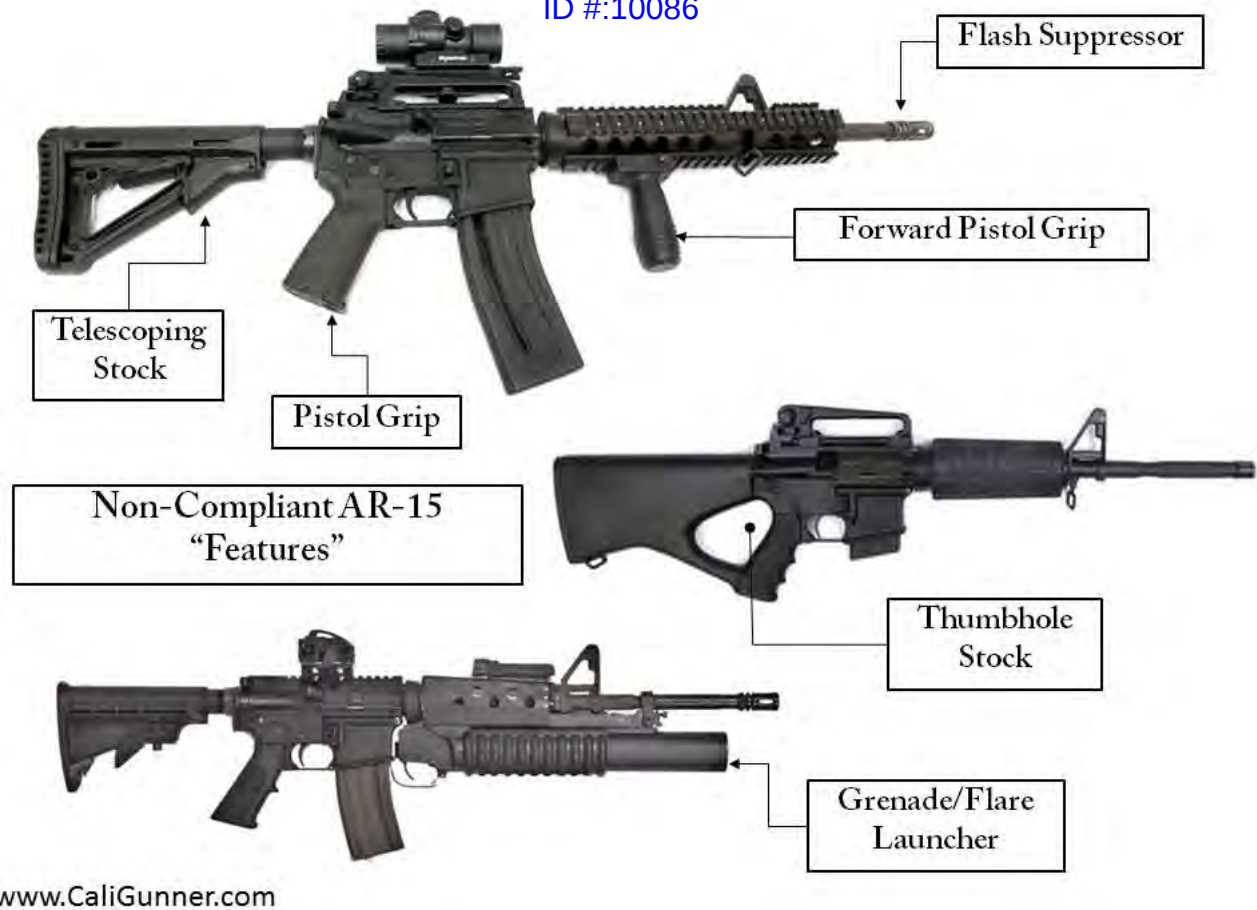
What is a Featureless Rifle?

A Featureless Rifle is the term used to describe a semi-automatic rifle that **does not** have any of the following:

1. A pistol grip that protrudes conspicuously beneath the action of the weapon
2. A thumbhole stock
3. A folding or telescoping stock
4. A grenade launcher or flare launcher
5. A flash suppressor
6. A forward pistol grip

What do Rifles with Features Look Like?

The figure below labels the features a normal AR-15 has that gun owners in free states typically have (minus the grenade launcher).



Disclaimer: I'm not a lawyer, this is meant to be helpful information not legal advice.

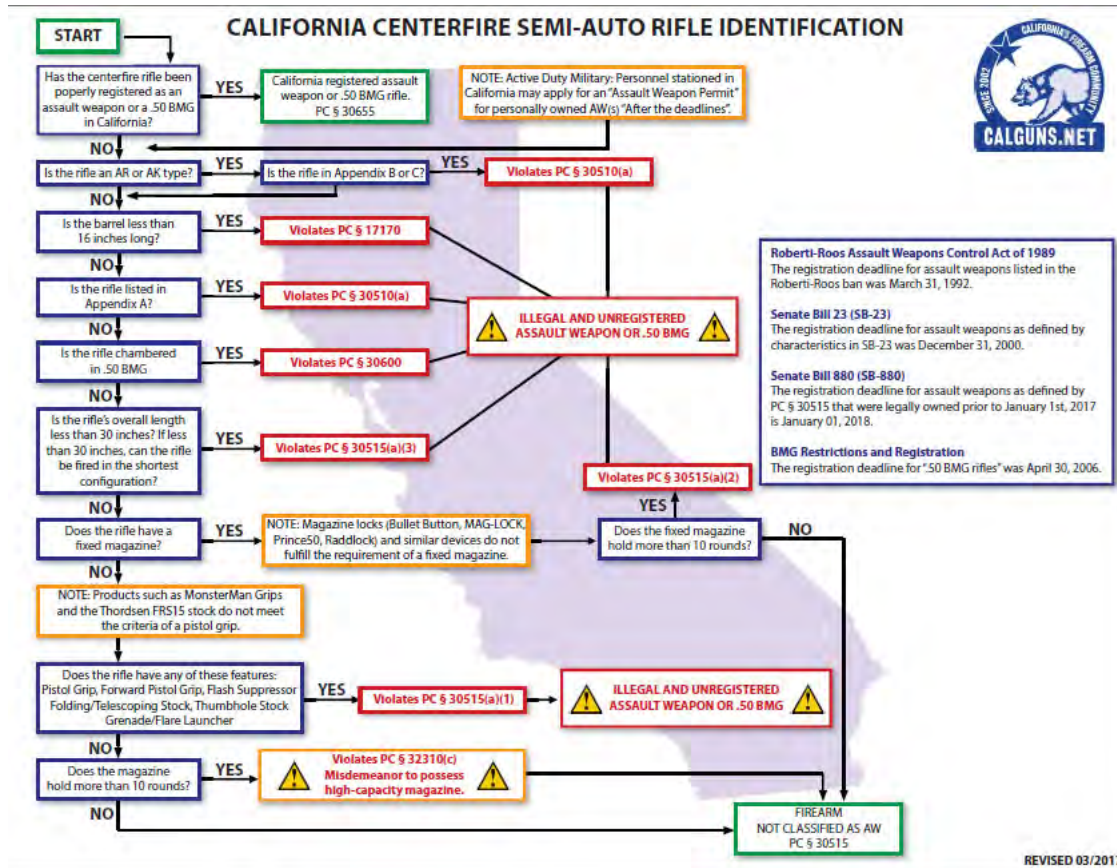
So even if you have JUST ONE of these features on your semi-automatic centerfire rifle you own what California considers to be an "assault weapon" unless your magazine is fixed. The only way for Californians to possess these features legally on a semi-automatic centerfire rifle is to either have A) the weapon registered as an "assault weapon" or B) have a fixed magazine which we will discuss later.

Can I Still Register My Rifle as an Assault Weapon?

Nope. The option to register a rifle as an "assault weapon" in California only applied to guns that were built or bought before 2017, you then had until July 1 2018 to register with the DOJ (<https://cfars.doj.ca.gov/login.do>). So again, if you are new to the AR game you have the choice of either fixing the magazine with some type of magazine lock or going featureless.

How do I know if My Rifle is Legal?

We ideally don't want to be criminals, but the state sure is making things difficult. Nevertheless, Calguns.net constructed an informative flowchart to help gun owners determine if their rifle is legal. Start at the top left of the chart and answer the questions accordingly.



Here are some definitions to help understand the chart as defined by 11 CCR § 5469:

The following definitions apply to terms used in the identification of assault weapons pursuant to Penal Code section 30515:

- (a) "**Detachable magazine**" means any ammunition feeding device that can be removed readily from the firearm with neither disassembly of the firearm action nor use of a tool being required. A bullet or ammunition cartridge is considered a tool. Ammunition feeding device includes any belted or linked ammunition, but does not include clips, en bloc clips, or stripper clips that load cartridges into the magazine.
- (b) "**Flash suppressor**" means any device designed, intended, or that functions to perceptibly reduce or redirect muzzle flash from the shooter's field of vision.
- (c) "**Forward pistol grip**" means a grip that allows for a pistol style grasp forward of the trigger.
- (d) "**Pistol grip that protrudes conspicuously beneath the action of the weapon**" means a grip that allows for a pistol style grasp in which the web of the trigger hand (between the thumb and index finger) can be placed below the top of the exposed portion of the trigger while firing.

- Case 8:17-cv-00746-JLS-JDE Document 151-4 Filed 05/26/23 Page 17 of 31 Page ID #:10088
- (e) "Thumbhole stock" means a stock with a hole that allows the thumb of the trigger hand to penetrate into or through the stock while firing.

Legal Barrel and Overall Rifle Lengths

California requires the following minimum lengths for your rifle:

- **16" minimum barrel length**, pinned and welded muzzle devices count for length (meaning you could have a 14.5" barrel as long as you have a permanently attached muzzle device making the overall like 16" or more)
- **30" minimum overall length for centerfire-semi-automatics** (such as AR-15's chambered in .223/5.56 NATO), measured with stock in the shorted position the rifle can still fire in
- **26" for rimfires and non-semi centerfires**; measured with stock in the shorted position the rifle can still fire in

So this is helpful, but maybe you want it spelled out a little more, I got it. Let's keep going.

To have a featureless rifle you must, well, remove the features! Let's address each item and discuss the options.

Featureless Grip and Stock Options

If you have become accustomed to shooting an AR-15 with features in the past, **the grip and stock configuration will be the most drastic change when moving to a featureless rifle.** With that said, after you spend plenty of time on the range you will eventually adapt. Everyone has a preference on what looks the "best" but the top picks below are all great functioning options.

The Thordsen FRS Stock (<http://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2F stock-parts%2F buttstocks%2F ar-15-frs-15-stock-assy-quick-detach-carbine-length-prod87747.aspx>) is an incredibly popular choice for many California shooters. What you are essentially getting with a Thordsen is a conventional rifle stock for your AR-15. The main advantage over most other featureless options is ergonomics. It allows for a much more natural feel since your thumb can wrap around the grip of the firearm which provides more comfort and a sense of control.



<https://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2F stock-parts%2F buttstocks%2F ar-15-frs-15-stock-assy-quick-detach-carbine-length-prod87747.aspx>

The Hera CQR CA Compliant Stock (<https://amzn.to/2OWuscA>) is another option that many feel is more aesthetic than the Thordsen, of course this is subjective. There is a non-compliant version with a thumbhole so be sure to buy the compliant version as shown below. One thing I really like is that it has spacers available to adjust the length of pull.



<https://amzn.to/2OWuscA>

HERA CQR CALIFORNIA COMPLIANT STOCK
([HTTPS://AMZN.TO/2OWUSCA](https://amzn.to/2OWuscA))

Another option is to use a **fin grip** (<http://brownells.dts2xn.net/Q5dQY>) like the one below. They are a cheap option that appears to appease the powers that be in Sacramento. Once installed, your thumb cannot wrap around the grip making it good to go.



(brownells.dts2xn.net/Q5dQY).

AR-15 MONSTERMAN GRIP ([HTTP://BROWNELLS.DTS2XN.NET/Q5DQY](http://BROWNELLS.DTS2XN.NET/Q5DQY))

Using a “fin grip” and fixed stock is the cheapest way to convert your AR-15 into a featureless rifle (with compliant muzzle device of course).



CALIFORNIA COMPLIANT FEATURELESS AR-15 WITH MONSTERMAN GRIP



([https://brownells.7eer.net/c/1200207/60594/1625?
u=https%3A%2F%2Fwww.brownells.com%2F rifle-
parts%2F stock-
parts%2F buttstocks%2F ar-15-
moe-stock-fixed-mil-spec-
prod56792.aspx](https://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2F stock-parts%2F buttstocks%2F ar-15-moe-stock-fixed-mil-spec-prod56792.aspx)).

MAGPUL FIXED STOCK - SEE THE LATEST PRICE AT
BROWNELLS
([https://brownells.7eer.net/c/1200207/60594/1625?
u=https%3A%2F%2Fwww.brownells.com%2F rifle-
parts%2F stock-parts%2F buttstocks%2F ar-15-
moe-stock-fixed-mil-spec-prod56792.aspx](https://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2F stock-parts%2F buttstocks%2F ar-15-moe-stock-fixed-mil-spec-prod56792.aspx))



([https://brownells.7eer.net/c/1200207/60594/1625?
u=https%3A%2F%2Fwww.brownells.com%2F rifle-
parts%2F stock-
parts%2F buttstocks%2F ar-15-
sabertube-stock-fixed-mil-spec-
prod79482.aspx](https://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2F stock-parts%2F buttstocks%2F ar-15-sabertube-stock-fixed-mil-spec-prod79482.aspx)).

AR-15 SABERTUBE STOCK
(<https://brownells.7eer.net/eb99r>)



(<https://brownells.7eer.net/eb99r>).

DOUBLESTAR ACE ULTRALITE STOCK, CHECK PRICE AT
BROWNELLS (<https://brownells.7eer.net/eb99r>)

See all AR-15 Fixed Stocks
(<https://brownells.dts2xn.net/5V032>)

Top Compliant Muzzle Brakes



Flash suppressor means any device designed, intended, or that functions to perceptibly reduce or redirect muzzle flash from the shooter's field of vision. On the other hand a "muzzle brake", also know as a compensator, is a device connected to the muzzle of a firearm that redirects propellant gases to counter recoil and unwanted rising of the barrel during rapid fire.

For this reason, muzzle brakes are a popular choice for gun owners even where flash hidere are permissible. Some of my favorite muzzle brakes include:



(<http://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2F muzzle-devices%2F compensators-amp-muzzle-brakes%2Far-15-gamma-556-ex-muzzle-brake-5-56-prod105087.aspx>).

GAMMA VG6 - SEE MORE DETAILS
([HTTP://BROWNELLS.7EER.NET/C/1200207/60594/1625?U=HTTPS%3A%2F%2FWWW.BROWNELLS.COM%2F RIFLE-PARTS%2F MUZZLE-DEVICES%2F COMPENSATORS-AMP-MUZZLE-BRAKES%2Far-15-GAMMA-556-EX-MUZZLE-BRAKE-5-56-PROD105087.ASPX](http://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2F muzzle-devices%2F compensators-amp-muzzle-brakes%2Far-15-gamma-556-ex-muzzle-brake-5-56-prod105087.aspx))



(<https://www.brownells.com/rifle-parts/muzzle-devices/compensators-and-muzzle-brakes/miculek-compensator-22-caliber-1-2-28-steel-black-sku231000038-5573-12990.aspx?rrec=true>)

MICULEK COMPENSATOR - SEE MORE DETAILS
(<https://www.brownells.com/rifle-parts/muzzle-devices/compensators-and-muzzle-brakes/miculek-compensator-22-caliber-1-2-28-steel-black-sku231000038-5573-12990.aspx?rrec=true>)

See all Muzzle Brakes

(<https://brownells.dts2xn.net/LQdGY>)

Is Going Featureless the Only Way to Be Compliant?

No! There is another option that allows you to keep your features (pistol grip, folding/telescoping stock, forward grip and flash suppressor) while still being completely legal. This is the fixed or magazine lock option.

Fixed or Locked Magazine Option

This option allows the use of features on your AR-15 by fixing or locking the **10 round magazine (or less)** in your rifle while the lower is attached to the upper receiver. This is often done with a device like the Juggernaut Tactical Hellfighter Kit available at Brownells. (<https://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2Frifle-parts%2Freceiver-parts%2Ftakedown-parts%2Fpins%2Far-15-hellfighter-california-compliant-mod-kit-black-prod117045.aspx>) With a device like this you can use all the “evil features” described at the beginning of the article and still be legal. This is a great option for those that can’t get over the looks of a featureless rifle.



(<https://amzn.to/3jotQv9>).

Important Note: As mentioned above, the fixed or locked magazine option requires a 10 round magazine (or less). The magazine laws in California have been in flux (<https://CaliGunner.com/high-capacity-magazines/>), allowing opportunities for CA citizen to legally purchase standard capacity magazines (also improperly known as “large capacity magazines”). **Fixing a legally acquired 30 round magazine to your rifle with features is illegal, don’t do it.**

However, using legally acquired 30 round magazines in your featureless rifle is allowed. With that said, you still might get hassled for doing so, the choice is yours.



(<https://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2Freceiver-parts%2Ftakedown-parts%2Fpins%2Far-15-hellfighter-california-compliant-mod-kit-black-prod117045.aspx>).

Below is a demonstration on the use of a Juggernaut Tactical AR-15 Hellfighter California-Compliant Mod Kit (<https://brownells.7eer.net/c/1200207/60594/1625?u=https%3A%2F%2Fwww.brownells.com%2F rifle-parts%2Freceiver-parts%2Ftakedown-parts%2Fpins%2Far-15-hellfighter-california-compliant-mod-kit-black-prod117045.aspx>).

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See also The Complete Guide to the Hellfighter Mod Kit (<https://CaliGunner.com/juggernaut-tactical-hellfighter-complete-guide/>)

DIY AR-15 Fixed Magazine

There is a way to inexpensively fix a ten round magazine in your AR-15 allowing you to keep your features. This configuration requires a loader like the BF-10 seen here (<https://CaliGunner.com/bear-flag-defense-bf-10-loader-review/>). For the fixed install you will need the following tools:

- Drill (<https://amzn.to/2yRGQXL>).
- 6-32 Drill and Tap Set (<https://amzn.to/2KjSH6g>).
- 3/8" Set Screw (<https://amzn.to/2Kx6sL1>).

Step 1: Remove bolt catch and magazine catch from your lower receiver (for lower receiver assembly/disassembly check my article here (<https://CaliGunner.com/ar-15-lower-receiver-assembly/>)).

Step 2: Drill hole for 6-32 tap through the top of your receiver at the end of the bolt catch groove like shown below.



Step 4: Reinstall magazine catch then install your 10 round magazine you want to fix in place.

Step 5: Thread 6-32 set screw (3/8" long) into hole so that it is tight against the magazine catch.



Step 6: Reinstall bolt catch. That's it!

Just make sure you have the set screw tight so that the magazine won't release even with lots of force. The nice thing about this option is that it is easily removable if traveling to other states. Again for this option, you will want a loader like the BF-10 (<https://CaliGunner.com/bear-flag-defense-bf-10-loader-review/>).

Helpful Additions to Featureless Rifles

Several of the grip and stock options above keep the thumb of your trigger hand in an unusual position and can make it more difficult to select the safety. There two items I recommend to address these issues. The first is a thumb rest made by Juggernaut Tactical. It replaces the rear takedown pin and provides a comfortable position to rest your thumb.



The second item we recommend is an ambidextrous safety. If you're right-handed using a featureless rifle your trigger hand will not be able to select the safety; you'll have to use the opposite hand. Once you install an ambidextrous-safety you can easily select the safety with your trigger hand.



Advantages and Disadvantages of Going Featureless

From a practical perspective, the featureless rifle remains completely usable in the sense that you can reload the rifle in a conventional and timely manner without the need of any tools or disassembly of the lower receiver from the upper receiver. From this perspective using a featureless rifle is a better option for self-defense.

Some people that are critical of the featureless option complain of the aesthetics of the available options. While that may be true for some, the overall function of the rifle is mostly maintained. Another possible downside of the featureless set up is that the authorities could eventually change the laws once more forcing law-abiding citizens to

Conclusion

For the time being, going featureless seems to be the best legal configuration when keeping the functionality of the rifle in mind. We are already seeing several companies continue to innovate and provide new products that look decent and perform well considering the constraints of the law.

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